

EXHIBIT 2

Email Summarizing the April 26, 2019 Meet and Confer

From: [Harutyunyan, Sati](#)
To: [Harutyunyan, Sati](#)
Subject: FW: Recap of today's meet-and-confer
Date: Monday, May 06, 2019 2:38:48 PM

From: Nicholas Marritz
Sent: Friday, April 26, 2019 5:28 PM
To: David.Haller@hklaw.com; Stuart.Nash@hklaw.com; Robert.Farlow@hklaw.com
Cc: john.brownlee@hklaw.com
Subject: Recap of today's meet-and-confer

Counsel,

Thank you for today's telephone meet-and-confer. Here is a summary of our call; please let me know if you disagree with or have a different understanding about any part of it.

We noted that on April 24, you served Plaintiff's counsel with 1,994 requests for admissions. We stated our belief that such a large number of interrogatories is on its face unduly burdensome and disproportionate to the needs of a one-plaintiff case, and that this position is supported by ample case law. We also noted that these RFAs do not serve the purpose of the Federal Rules that govern discovery. We noted that many of the individual requests for admission are also substantively improper for various reasons, such as calling for legal conclusions or asking for the admission of facts in pleadings that have since been superseded.

You replied that 1,994 requests for admissions was a reasonable number. You noted that the bulk of the requests consist of 8 mostly identical questions about 259 photographs and videos that the Defendants have produced in discovery, and opined that it should take no more than three hours to answer these questions. You stated that the number of requests was also reasonable because the 259 photographs and videos were things that the Plaintiff had asked for in discovery, and because Plaintiff's answers during her 13-hour deposition were evasive. You stated that because Plaintiff asked for the photographs and because you believe the photographs are highly relevant to the case, you are entitled to multiple RFAs regarding each photograph.

We offered to stipulate to the authenticity of the photographs and videos at issue. We then asked you to withdraw your requests for admissions and re-serve us with a reasonable number proportionate to the needs of the case. You responded that 1,994 was a reasonable number of requests for admissions under the circumstances of the case and that you did not consider the number of requests a sufficient basis to withdraw any of them. You stated that if we went through your RFAs and identified every request we found objectionable or improper, you would be willing to withdraw. We responded that doing so for 1,994 RFAs was an improper use of a meet-and-confer. We asked that you come back to us with a more reasonable number of requests. You declined to lower the number of requests and repeated your position that the current number is reasonable.

The parties reached impasse on the issue.

Nicholas Marritz, Staff Attorney

Legal Aid Justice Center
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
T: 703-720-5607
F: 703-778-3454
E: nicholas@justice4all.org

Sati Harutyunyan

Jenner & Block LLP

1099 New York Avenue, NW
Suite 900, Washington, DC 20001-4412 | jenner.com
+1 202 637 6347 | TEL
SHarutyunyan@jenner.com
[Download V-Card](#) | [View Biography](#)

CONFIDENTIALITY WARNING: This email may contain privileged or confidential information and is for the sole use of the intended recipient(s). Any unauthorized use or disclosure of this communication is prohibited. If you believe that you have received this email in error, please notify the sender immediately and delete it from your system.
